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BENITO GAGUINE EX PARTE OR LATE FILED MAR 10 1994

Attorney at Law

2300 M Street, NW, Suite 900
Washington, D.C. 20037

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OFFICE OF THE SECRETARY

Telephone (202) 331-7143

Fax (202) 293-2509

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March 9, 1994

William Caton, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554


Dear Mr. Caton:

There is submitted herewith for filing in MM Docket # 87-268 an original and 9 copies of Comments #5, submitted by Isaac S. Blonder of Blonder Broadcasting Corporation.

Should the Commission desire any clarification, or explanation of the Comments, Mr. Blonder and the undersigned will be pleased to supply same.

The credentials of Mr. Blonder to submit these comments are a matter of record at the Commission, and well enough known, so that no further information concerning such credentials need be filed.

Very truly yours,


BENITO GAGUINE
Counsel for
Blonder Broadcasting Corporation

BG/lrc

cc: Chairman Hundt
Commissioner James Quello
Commissioner Barrett
Thomas P. Stanley, Chief Engineer

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MAR 10 1994

**HDTV 3DTV
BLONDER BROADCASTING CORP.**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Isaac S. Blonder-----9 Beaver Hill Rd., Morganville, N. J.----(908) 946-2447

COMMENT number 5**ON THE THIRD REPORT AND ORDER OF MM DOCKET NO. 87 - 268**

Advanced Television Systems is only one of the conundrums in the lap of the FCC. Equally impinging upon the welfare of the TV households are these question marks.

1. Will Free Broadcasting be able to survive being limited to HDTV signals?
2. Can 6 mhz deliver the TV systems, with higher resolution than 1000 lines, now under development?
3. What is the cost to the US public for cable and satellite delivery when Free Broadcasting goes out the window?
4. Can a plan be devised that is fair to the purse of the US treasury, the present TV licensees, and painless to the public pocketbook?

Such a plan is outlined as follows:

Assign 12 contiguous mhz to all UHF TV stations. 6 mhz will be devoted to NTSC transmissions for 10 years, the other 6 mhz occupied by digital signals eventually to be codified by the FCC to a uniform standard after many field trials for quality and transmission ruggedness. The number of NTSC quality channels digitally transmitted simultaneously on 6 mhz may exceed 30. No fee should be paid by the existing UHF licensees for the extra bandwidth, as the reward for this painless transition to digital TV. My own experience with WEXP-TV 27,28 shows that the two signals can coexist on the same antenna and be received with full quality and ease on most current TV receivers.

12 mhz is thus available to deliver ultra high definition TV when it will inevitably appear.

Should the reduced interference of digital signals to other stations be as good as reported, the taboos could be reduced, and more stations be authorized. Low power TV, especially in geographic pockets, could be assigned with much tighter spacing and service many households now out of touch with civilization.

In 10 years, if the cost of digital decoders and digital receivers is no more than, say 5% above the NTSC model, all Vhf stations will cease operating and the VHF spectrum be put up for auction. It seems likely that the resulting auction income will be enough to

pay the present VHF owners a reasonable sum for their property and fill the public purse as well. At the very least, the VHF owners will have 10 years grace to recover their investment, whose original cost was 0 (plus lawyers fees!).

If the digital format performs as predicted, and each market has 5 stations, the average TV home will be able to enjoy hundreds of advertiser - supported channels! It is also apparent that many other services living on the high bit capacity of the free signals will enrich the educational and economic health of our citizenry.

Does the enriched TV diet of the home threaten the cable and telephone industry? Their hard wired cable and telephone feed to the home is necessary for security and copy-right protection, as well as interactive attractions. Survival of these entities should be assured.

Finally, the very positive benefit to the home viewer of Free TV Broadcasting should be proclaimed to the heavens. 100 million TV homes at an average fee of \$200 yearly for basic cable TV viewing, comes to 20 billion dollars yearly. What a nice gift to the American voter!

Advantages of the 12 mhz plan

Efficient use of the spectrum. Single antenna, wider bandwidth, less terrestrial interference. More services by the Free Broadcaster to their viewers.

12 mhz gives the US a global advantage over the world in room for HDTV and other services.

Lowest economic price to be paid for new technologies. Lowest disruption of existing services. Instant conversion without the roadblock of intensive research.